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October 2, 2002

By Hand

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, N.W.,  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Notice: IB Docket No. 01-185

Dear Madame Secretary:

On October 1, 2002, Tyrone Brown, Vice Chairman of Iridium Satellite LLC, Gino Picasso, CEO, Charlene King, Vice President for Corporate Strategy, and the undersigned, attorney for Iridium Satellite, met in person with Anna Gomez, Breck Blalock, Chris Murphy, Karl Kensinger, and Alexandra Field, all of the International Bureau, to discuss matters relevant to the above-referenced proceedings and the petition for rulemaking filed by Iridium on July 26, 2002. The attached materials were discussed at the meeting.

Respectfully submitted,



Jeffrey H. Olson  
Attorney for Iridium Satellite LLC

Enclosure

cc: Anna Gomez  
Breck Blalock  
Chris Murphy

Karl Kensinger  
Alexandra Field

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## BIG LEO BANDS

### Existing Allocation Inequities and ATC

#### 1.6 GHz Band

##### Current Utilization:



##### Iridium's Redistribution Proposal:



#### 2.4 GHz Band

##### Current Utilization:



Iridium's existing constellation cannot operate in the 2.4 GHz band.

- It is critical that the Commission provide for an equitable distribution of the 1.6 GHz band, granting Iridium access to substantial additional spectrum, in order to enable Iridium to meet existing and near-term demand.
- The original Big LEO assignments were based on assumptions (4 operating CDMA systems) that have not been realized. Additionally, these assignments imposed technical constraints on the Iridium system (uplinking and downlinking in the same narrow band) not imposed on the other Big LEO systems (or any other MSS system).
- If ATC is permitted, the inequities of the Big LEO allocation and competitive disadvantage to Iridium will be greatly magnified. The requirement that the Iridium system uplink and downlink in the same band (1.6 GHz) places it at a significant disadvantage vis à vis all other MSS systems, which enjoy substantial separation between their uplinks and downlinks. This separation greatly simplifies other MSS systems' ability to provide ATC.
- Even if the requested 6 MHz of additional spectrum is assigned to Iridium, it would remain at a significant competitive disadvantage compared to all other MSS systems, due to the enormous bandwidth advantage that still would be enjoyed by, e.g., Globalstar, and the difficulties inherent in uplinking and downlinking in the same band. Both these inequities would hamstring Iridium's ability to develop a competitive ATC service.